IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORIGA ATLANTA DIVISION

SARAH C. DOZIER, as Administrator of

The Estate of KATHRYN JOHNSTON

:

Plaintiff,

:

v. : CIVIL ACTION

CASE NO.

1:08CV00007MHS

:

CITY OF ATLANTA, et al.

:

Defendants.

PLAINTIFF'S NOTICE OF FILING ORIGINAL DISCOVERY

COMES NOW the Plaintiff in the above-styled cause pursuant to Federal Rules of Civil Procedure, and hereby files the following original discovery with the Court:

- 1. Affidavit of Jason R. Smith;
- 4. Affidavit of Gregg Junnier;
- 5. Affidavit of Wilbert Stallings;
- 6. Deposition of Lt. Stacie Gibbs;
- 7. Deposition of Deputy Chief Peter Andreson
- 8. Deposition of Lane Hagin;

- 9. Deposition of Chief Richard J. Pennington;
- 10. Deposition of Officer Cary Bond;
- 11. Deposition of Major E.R. Finley;
- 12. Deposition of Holly Buchanan;
- 13. Deposition of Sgt. Scott Kreher
- 14. Deposition of Assistant Chief Alan Dreher with Amendment;
- 15. Deposition of Major Pearlene Williams;
- 16. Deposition of Ex-Deputy Chief Marion Brooks;
- 17. Deposition of Investigator Paul Vignola;
- 18. Deposition of Lt. John Mathis;
- 19. Deposition of Ivant T. Fields;
- 20. Deposition of Louis Arcangeli; and
- 21. Exhibits 1-41 to Depositions

Respectfully submitted,

MORAITAKIS, KUSHEL, PEARSON &

GARDNER, LLP

Nicholas C. Moraitakis

Georgia Bar No. 521525

Co-Counsel for Plaintiff Sarah C. Dozier, Administrator of The Estate of Kathryn Johnston

3445 Peachtree Road N.E. Suite 425 Atlanta, Georgia 30326 Phone: 404-261-0016

Fax: 404-261-0024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically filed the foregoing **PLAINTIFF'S NOTICE OF FILING ORIGINAL DISCOVERY** with the Clerk of Court using the CM/CF system which will automatically send e-mail notification of such filing to the following attorney of record:

Dennis M. Young, Esq.
City of Atlanta Law Department
68 Mitchell Street, S.W.
Suite 4100
Atlanta, GA 30303

Arthur Tesler, *pro se* 4014 Caddie Drive, N.W. Acworth, GA 30101

Gregg Junnier # 59088-019
Federal Correctional Institution
P.O. Box 1031
Coleman, Florida 33521

This 27 day of December, 2009.

MORAITAKIS, KUSHEL, PEARSON & GARDNER, LLP

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Nicholas C. Moraitakis Ga. Bar No. 521525